

EXHIBIT Z

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July 27, 2020

Gretchen M. Callas, Esq.
Jackson Kelly PLLC
P. O. Box 553
Charleston, West Virginia 25322

Re: *City of Huntington, et. al. v. AmerisourceBergen Drug Corp., et al.*
Civil Action No. 3:17-cv-01362
Southern District of West Virginia

Dear Ms. Callas:

As you know, our firm represents University Physicians & Surgeons, Inc., ("Marshall Health") and the Marshall University Board of Governors ("Marshall University"). We also represent Drs. Shapiro, Werthammer, and O'Connell in their capacity as employees of Marshall Health and as faculty members of Marshall University. We have received copies of the subpoena issued by you in the above referenced civil action, dated July 23, 2020, directed to Drs. Shapiro, Werthammer, and O'Connell, as well as a subpoena of even date made for a Rule 30(b)(6) examination request, copies of which are enclosed for your reference. The O'Connell subpoena and the Rule 30(b)(6) subpoena revise or amend subpoenas previously issued. Neither Marshall Health, Marshall University, nor Drs. Shapiro, Werthammer, or O'Connell are parties to the above referenced civil action.

This letter is served on you as the written objection to the subpoena(s), under F.R.C.P. 45(d)(2)(B), of the persons and entity purported to be commanded by the subpoena to be deposed or examined.

As has been reiterated to the parties participating in this case, individual subpoenas and the cumulative nature of the subpoenas have been overly broad and have posed an undue burden upon our clients, a burden which the parties have an obligation to avoid. In addition to the requesting parties' duty to avoid undue burden on respondents to these subpoenas, the requesting party also must avoid undue and significant expense. To that end, Marshall Health and Marshall University request that the Defendants make arrangements to supply financial compensation not only for the time spent in deposition, but also for any time spent and expenses incurred in preparation therefor.

If you would like to discuss this matter, please do not hesitate to contact me.

Very truly yours,

/s/ Joel P. Jones, Jr. _____

Joel P. Jones, Jr.

JPJJR/eac

cc: Steven R. Ruby
Brent R. Gary
Joseph Mahady
Kent Bryson
Ryan Ashworth

Enclosure